

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY**Bureau of Land**

EPA Region 5 Records Ctr.



243505

0450305002--Edgar County
Paris/MIDWEST BODY CORPORATION
ILD005157888
FOS
01/26/94

RCRA COMPLIANCE EVALUATION INSPECTION (CED)
REPORT NARRATIVE

Introduction

The above-captioned site was inspected by Jeff Turner, DLPC/FOS-Champaign, on 26 January 1994 between 10:30 am and 12:00 pm. Mr John Jeffers, president of Midwest Body, was interviewed. Weather conditions were cold (high 20°s-low 30°s), windy, and overcast.

Midwest Body Corporation (hereafter "Midwest") manufactured and sold specialized truck bodies. Midwest ceased operations on 1 September 1994, when American National Bank foreclosed on it. The bank has a lien on the property, and all other assets have been liquidated. Midwest still exists legally as a corporation, as under State of Illinois laws of incorporation, incorporation years run from June until June. Thus, Midwest will retain corporation status (on paper) until June 1994. The company contact for regulatory purposes is John Jeffers. Mr Jeffers stated that approximately one week after the inspection, his current office would be changing, but that it would still be in the same building. The address and phone number at the time of the inspection were as follows.

Midwest Body Corporation
c/o John Jeffers
310 S. Michigan Avenue
Suite 2101
Chicago, IL 60604
312/427-5656

Mr Jeffers noted that after the move, all correspondence and phone calls would forward, but he agreed to send the new address and phone number as soon as they become available.

Regulated Activities

Midwest initially notified as a fully regulated generator on 18 August 1980. During a 1987 RCRA CEI, the company informed the inspector that it intended to switch from enamel-based paint to water-based paint in order to reduce the amount of hazardous waste generated. At the time of the last CEI (24 October 1989), Midwest was using both enamel- and water-based paint. This lowered its generation rate into small quantity generator (100-1000 kg/mo) status. In addition to generation, Midwest also accumulated waste in drums prior to transport off-site. Because Midwest was shipping to a TSD more than 200 miles away, it was allowed a 270 day accumulation limit under small quantity generator regulations. There were no known treatment, storage, or disposal activities at Midwest.

Due to the foreclosure of Midwest, production ceased and all on-site employees ceased to be employed at the Paris site, and the property was prepared for auction. During this time, all records and paperwork, including waste manifests were removed from site. However, the results of a manifest search for 1992 and 1993 requested by FOS revealed that Midwest remained in small quantity generator status.

Manufacturing Process and Services

During its time as an active business, Midwest produced truck bodies. The following processes and services were done on-site.

Sales

Only general refuse such as paper was generated from sales activities. As such, this wastestream was not significant under the scope of a CEI, as general office waste would be regulated only as a solid waste, not a hazardous waste or special waste.

Parts Stamping/Cutting

Metal parts were stamped and cut from steel. Prior to cutting, a thin coat of oil was applied to the steel. This was subsequently removed in a parts washer.

Welding

Arc welding was used to manufacture metal parts from the cut and stamped pieces of steel. Cooling water used in this process was recirculated and reused.

Parts Washing

Metal parts were washed in a five-stage parts washer prior to painting. Water-based washing phosphate solutions and water rinses were used.

Wood Treatment

Cut and grooved wood pieces were treated in a tank using *Woodtreat* wood preserver. Based on past CEI reports in the Regional file, apparently no waste was generated from wood treating.

Painting

Painting was performed in paint booths. Small parts were painted in dip tanks. As mentioned previously, Midwest had partially switched over to using water-based paints in order to minimize the amount of hazardous waste generated. However, judging from the manifests, some enamel paints were still used as late as mid-1993. Enamel paints required that the paint lines be flushed with xylene whenever the color of the paint was to be switched. Thus, enamel paints would result in listed and characteristic hazardous wastes.

Equipment Repair and Maintenance

Repair and maintenance of equipment was performed on site, including small parts washing and changing of lubricating oils from lift trucks.

Wastestreams

The following wastestreams were generated when the plant was still in active operation. The only records available at the time of the inspection for review were copies of manifests obtained within the Agency. Thus the only one of the following wastestreams for which documents demonstrate recent generation is the hazardous paint wastestream. The other wastestream descriptions are compiled from the previous CEI report; the wastestreams are assumed (based on statements by Mr Jeffers during the inspection) to have been generated up to the time of the shutdown of the company.

Hazardous Wastes

■ *Waste Paint Materials - F003 D001*

This wastestream was generated by the flushing out of enamel paint lines with xylene. This resulted in the generation of a paint sludge. This waste was disposed of at Chemical Conservation of Georgia in Valdosta, GA and at Safety-Kleen in Dolton, IL during 1992 and 1993.

Special (Nonhazardous) Wastes

- *Paint Sludge*
This waste was generated during usage of the water-based painting system. It was landfilled at Peoria Disposal Company Landfill in Peoria, IL.
- *Paint Booth Filters*
These were air filters used to trap airborne paint particles, apparently for the enamel paint as well as the water based. Like the paint sludge, these were landfilled.
- *Water-soluble Parts Washer Rinsates*
A phosphate-based, water-soluble washing solution was used for parts-cleaning. Whenever spent washer was generated, it was discharged to the municipal waste water treatment facility.
- *Welding Cooling Water*
At the time of the last CEI in 1989, this cooling water was recirculated and the facility did not anticipate generating any as waste. If it were to have been generated as waste, they intended to discharge it to the municipal waste water treatment facility.
- *Waste Oil*
This was generated from equipment maintenance. It was hauled by Consolidated Recycling to their Troy, IN facility.

Unidentified Waste Currently on Site and Other Topics

At the time of the current inspection, there were approximately 70 to 80 drums of waste on site for which no formal waste determination had been made. Mr Jeffers stated that approximately 50 of these drums had been more or less recently generated prior to the shutdown of the plant, while the other 20-30 drums had been rounded up by Safety-Kleen when they were engaged by Midwest to help prepare the site for auction. Mr Jeffers was uncertain exactly where these miscellaneous drums had been found, or whether Safety-Kleen had kept a log of where they had been found.

Most of the drums appeared to contain some type of paint waste. However, there were at least two or three drums bearing a manufacturer's label designating their contents as sodium hydroxide. If these drums of sodium hydroxide are waste, they will be hazardous waste, as the pH would certainly be greater than 12.5.

Mr Jeffers stated that Safety-Kleen would be returning in a few weeks to make waste determinations and get the waste shipped off-site. The contact person for the project is David Mendoza from Safety-Kleen's Urbana, IL facility. Mr Jeffers stated that the reason for the delay in getting the waste determination made is that the property auction and the Christmas holidays had intervened, and subsequently Midwest had a small work crew on-site scrapping out and salvaging various metal furnishings. Apparently when Safety-Kleen and the salvage crew were both on-site during December, they were getting in each other's way enough that there were safety concerns for the possibility of equipment accidents. Thus as soon as all the drums were located and assembled in a staging area in the northwest portion of the building (see photos and site map), Safety-Kleen was released from the site until after the salvage crew finishes their task.

Consequently, there is a large amount of waste of unknown regulatory status currently on-site. The majority of this waste might likely only be special waste. However, some of the waste could be hazardous waste, and this could lead to problems. As was explained to Mr Jeffers, this is particularly (although not exclusively) true if any of the drums of unknown-age waste turn out to be hazardous waste. Given the number of drums on-site, there is the high potential that Midwest has inadvertently become an unpermitted storage site. However, this cannot be known until after Safety-Kleen has made a waste determination for the drums, and no apparent violations for unpermitted storage are cited at this time. Mr Jeffers was asked to contact the Agency as soon as waste determinations are made.

Salvageable metal materials are being gathered up from around the property, inside and out. There is also a fair amount of scrap wood on-site. Mr Jeffers stated that he currently has no plans to have it removed. I stated that the wood, although relatively innocuous, is technically a waste and would be viewed as such by the Agency, particularly if citizen complaints are received. Therefore it is definitely in his best interests to remove the scrap wood from the site, as well as the salvageable metal.

Summary of Apparent Violations

35 Illinois Administrative Code §722.111 -- at the time of the inspection, no waste determination had been made for the 70-80 drums of waste on-site.

35 Illinois Administrative Code §722.123(a) -- at the time of the inspection, Midwest had no records on site, including manifests.

35 Illinois Administrative Code §722.140(a) -- at the time of the inspection, Midwest had no records on site, including manifests.

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35 Illinois Administrative Code §722.140(c) -- at the time of the inspection, Midwest had no records on site, including records of waste analysis and waste determinations.

35 Illinois Administrative Code §728.107(a)(6) - at the time of the inspection, Midwest had no records on site, including records of LDR determinations and notifications.

JST

Attachments:

1. Site Map
2. Inspection Photographs